



CENTRE INTERNATIONAL DE RECHERCHE SUR LE CANCER  
INTERNATIONAL AGENCY FOR RESEARCH ON CANCER

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In reply please refer to : C2/12/11

26 May 1981

Prière de rappeler la référence :

Dear Dr Infante

Thank you for your letter of 12 May 1981.

I was surprised by some of your remarks, especially those suggesting both that the Working Group was not familiar with IARC criteria, and further, intimating that the members of the Working Group did not follow these criteria when reviewing data on formaldehyde.

While we are grateful for comments on the activities of such working groups, since they help IARC to improve the quality of evaluations, I would like to reassure you, however, that not only were the members of this working group scientists of experience and wide knowledge, but also, they were perfectly aware of all the elements which are required in making an evaluation.

I appreciate your willingness to provide us with new information; however, you will be aware that it is IARC policy when evaluating chemicals included in the Monograph Series, to consider only data that has appeared, or will be published, in the peer-reviewed scientific literature. No exception is made to this rule, as past experience has shown that making exceptions, such as using the Federal Register, reports from the Regulatory Agency, etc., may lead to misunderstandings, error and complaints, as was the case, for example, with beryllium. Only for information related to the production and use of substances do we depart from that rule, because such data are not taken into consideration in building up an evaluation, and because most are not published normally in the scientific literature.

Dr P.F. Infante  
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and Classification  
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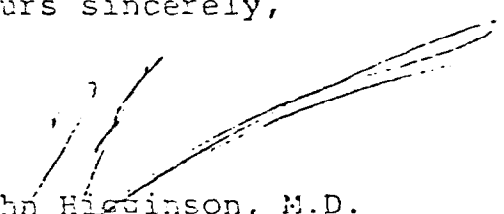
I would add that your letter, its content and style, also its wide dissemination, could be interpreted as an attempt by OSHA to influence a working party of the Agency, and to cast aspersions on the scientific integrity and objectivity of its members whose reputations are internationally recognized. Further, it has serious political implications as attacking the objectivity of the Agency's Scientific and Governing Councils. I should point out that the United States is officially represented on the latter. Perhaps Dr Kang, being on his first visit, was unfamiliar with the work and scientific background of the Committee. His views, unfortunately lend support to the views of some of the working group members that he was not appearing as an independent scientist as is the practice.

While this may not have been your intention, I am sure you realize that it is my immediate duty to protect the autonomy of the working group members, whose scientific integrity I have no reason to doubt.

Finally, I have the impression that your letter originates from your having received partial or incomplete information. The Working Group agreed that if the monograph on formaldehyde was to be published in Volume 27, its evaluation had to be formulated on the basis of the published information. For that reason, and unless further data on this compound appear in press or it has been officially confirmed that new data have been accepted for publication, the Working Group decided that the evaluation should be that there is limited evidence of carcinogenicity. The Working Group, including Dr Kang, left to the IARC Secretariat the option, however, of deciding whether the monograph on formaldehyde should be printed in its present form, or whether it should be delayed pending the publication of new data. It was also agreed that if new data have appeared in press before the monograph is due to be sent to the printer, the evaluation would be revised.

Copies of your letter and my reply will be circulated to all members of the Working Party.

Yours sincerely,



John Higginson, M.D.  
Director

cc: Dr T.G. Auchter, Washington D.C., USA  
Dr L. Tomatis, IARC  
All members of the IARC Working Group

Dr R Griesemer, Oak Ridge National Lab., Dr D. Rall, NIEHS,  
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